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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00210-HZ**

**v.**

**GOVERNMENT’S SENTENCING  
MEMORANDUM**

**SOLOMON COOK,**

**Defendant.**

**I. Introduction**

Defendant Solomon Cook, while still a teenager himself, tricked multiple teenage girls into sending him explicit photos of themselves online, which he then used to extort them into performing increasingly degrading and painful sex acts on themselves. The government joins in the probation officer’s recommendation that the Court impose a sentence of 121 months imprisonment, ten years of supervised release, \$103,000 in restitution to the minor victims, and a \$400 fee assessment.

**II. Factual Background**

For more than a year, Cook posed as a “sugar daddy” online to entice girls and young women to send him nude photos of themselves in exchange for promises of payment. He used sophisticated methods, including creating an online female persona who would recruit girls to be

“sugar babies” for him and would vouch for the fact that he would pay them. Once the victims sent him a nude photo, his demands would quickly escalate. He would order them to penetrate themselves vaginally and anally with their fingers and with objects found in their house. He would require his victims to send him series of photographs, record videos, and perform for him on live video calls, while he instructed them on what sex acts to perform and how. When a victim asked to stop, he would threaten to distribute the photos he had of them if they did not continue. His victims included multiple girls under the age of 18, including at least one victim whom he knew personally.

Cook first came to the attention of law enforcement in January of 2022, approximately two months after his eighteenth birthday, when the parent of a minor victim reported that the user(s) behind two Instagram accounts had persuaded the victim to send a sexually explicit picture of herself, and then had threatened to distribute the image if she did not produce and send more. Screenshots of the conversation showed one Instagram account, which was eventually attributed to Cook, instructing the victim: “Either you obey or everything gets out. It gets leaked on Insta, school districts, Facebook, twitter, everywhere.” Further investigation, including a search of Cook’s devices and an interview of Cook, revealed that he had victimized multiple other teenage girls in a similar manner. In each case, he would offer the victim a large amount of money to send him nude images of herself. Once the victims agreed, Cook’s demands quickly escalated, and he began ordering his victims to penetrate themselves vaginally and anally with items found in their refrigerator, or with other household objects, or with multiple fingers. He persisted in his demands even when the victims told him they were in pain or begged him to let them sleep. When a victim told him that she wished to stop, he threatened to release the images she had already sent him unless she complied.

Using this method, Cook enticed and coerced Minor Victims 1, 2, and 3 to produce and send him child pornography of themselves. He also attempted to engage in similar conduct with

an undercover FBI employee, who told him she was thirteen years old. Additionally, at the time of his arrest on May 11, 2022, Cook possessed sexually explicit images of Minor Victims 4 and 5.<sup>1</sup>

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### **III. Sentence Recommendation**

The Court should adopt the joint recommendation of the parties and the United States Probation Office and impose a sentence of 121 months on Counts 1–3 and 120 months on Count 4, to run concurrently; ten years of supervised release; restitution to the victims in the amount of \$103,000; and a \$400 fee assessment.

The recommended sentence is sufficient but no greater than necessary to provide just punishment and deter further criminal conduct by this defendant. While his offense was egregious, the defendant was quite young himself when he targeted and exploited his minor victims. The joint recommendation of the parties appropriately reflects both the nature and circumstances of the offense, including the number of victims and physical and emotional pain the defendant inflicted on them, and the history and characteristics of the defendant, particularly his young age and lack of prior criminal history. Additionally, the special conditions of probation will provide the defendant with correctional treatment while helping to protect the public. The government respectfully urges the Court to adopt the recommendation of the parties

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<sup>1</sup> Cook enticed and coerced Minor Victims 4 and 5 to send him these images while he was still a minor himself. He is therefore charged in the superseding information only with possessing their images as an adult, but not with the underlying enticement.

and the probation officer and impose a sentence of 121 months imprisonment, ten years of supervised release, restitution in the amount of \$103,000, and a \$400 special assessment.

Dated: March 26, 2025

Respectfully submitted,

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/s/ Mira Chernick  
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